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Attorneys for Defendants,  
TODD BALDINI, ABYGAIL BIRD,  
LAWRENCE STUART GIRARD and  
PAMELLA TEJADA

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT

EXAMWORKS, LLC, a Delaware  
limited liability company,

Plaintiff,

v.

TODD BALDINI, an individual,  
ABYGAIL BIRD, an individual,  
LAWRENCE STUART GIRARD,  
an individual, PAMELLA TEJADA,  
an individual, ROE  
CORPORATION, and DOES 1  
through 10,,

Defendants.

Case No. 2:20-cv-00920-KJM-DM  
Assigned to Hon. Kimberly J. Mueller  
Courtroom 3, 15<sup>th</sup> Floor

**STIPULATION TO EXTEND TIME  
TO FILE RESPONSIVE PLEADING  
TO COMPLAINT**

Action Filed: May 4, 2020

THE PARTIES, THROUGH THEIR RESPECTIVE ATTORNEYS OF  
RECORD, HEREBY STIPULATE AS FOLLOWS:

WHEREAS, Plaintiff ExamWorks, LLC (“Plaintiff”) filed a Complaint  
against Defendants Todd Baldini, Abygail Bird, Lawrence Stuart Girard, and Pamela  
Tejada (collectively “Defendants”) on May 4, 2020;

WHEREAS, Plaintiff obtained an Order for expedited discovery in this action;

WHEREAS, Defendants’ counsel accepted service of the Complaint on behalf

1 of Defendants on May 8, 2020 on the condition that Plaintiff agree to an extension  
2 through July 7, 2020 for Defendants to file a responsive pleading;

3 WHEREAS, Defendant's responsive pleading is currently due on  
4 May 29, 2020;

5 WHEREAS, the hearing on an order to show cause why a preliminary  
6 injunction should not be granted was originally set for May 22, 2020;

7 WHEREAS, the Parties are currently preparing for a preliminary injunction  
8 hearing and engaging in expedited discovery, including the inspection Defendants'  
9 electronic devices and accounts;

10 WHEREAS, Defendants are individuals and believe that focusing their  
11 resources on the foregoing activities and potential resolution of the action should be  
12 its focus over the next 45 days; and

13 WHEREAS, this is the first extension with respect to Defendants' Responsive  
14 Pleading;

15 IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES,  
16 THROUGH THEIR RESPECTIVE ATTORNEYS that Defendants shall have a  
17 39-day extension to file their responsive pleadings to Plaintiff's Complaint, so that  
18 they are now due on July 7, 2020.

19 Dated: May 21, 2020

Orrick, Herrington & Sutcliffe LLP

21 By: /s/ Robert Shwartz

22 Robert S. Shwartz

23 Catherine Y. Lui

24 Nathan Shaffer

Johanna L. Jacob

25 Attorneys for Plaintiff,

26 EXAMWORKS, LLC

1  
2 Dated: May 21, 2020

Ford & Harrison LLP

3  
4 By: /s/ Daniel Chammas

5 Daniel B Chammas

6 David Cheng

7 Attorneys for Defendants,

TODD BALDINI, ABYGAIL BIRD,


8 LAWRENCE STUART GIRARD

9 and PAMELLA TEJADA

10 -----  
11 ORDER

12 IT IS SO ORDERED that Defendants shall have a 39-day extension of time to  
13 file their responsive pleadings to Plaintiff's Complaint, which are now due on July 7,  
14 2020.

15 Dated: May 21, 2020.

16   
17 CHIEF UNITED STATES DISTRICT JUDGE  
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